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- \* Julius P. Hebert, Jr.
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- # Also Admitted in Texas

August 10, 2021  
**Confidential**

Harley M. Papa  
Derick A. Bercegeay

Certified Return Receipt  
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Louisiana Ethics Administration Program  
P.O. Box 4368  
Baton Rouge LA 70821

**RE: TPCG/Armanita Rainey  
Request for Opinion  
Conflict of Interest  
Our File #21172**

Dear Sir or Madam:

I am the Parish Attorney for the Terrebonne Parish Consolidated Government (TPCG). I am appointed by the Parish President and approved by the Terrebonne Parish Council in accordance with the Terrebonne Parish Charter and Code of Ordinances. I am seeking an ethics opinion on behalf of the head of the Department of Housing and Human Services, Kelli Cunningham, concerning one of her employees, Araminta Rainey.

Please provide me with an opinion on whether the son of Araminta Rainey, the Community Outreach Specialist for the Head Start Program, may participate in the Head Start Program administered by the Housing and Human Services Department of the Terrebonne Parish Consolidated Government.

TPCG is a Consolidated Government with various departments. Araminta Rainey works in the department of Housing and Human Services. This department has a Head Start Program division. Araminta is the Community Outreach Specialist for the Head Start Program. A major function of her job is to coordinate and implement all eligibility, recruitment, selection, enrollment, and attendance activities as required by the Head Start Performance Standards. The Head Start program provides childcare, education services, and family services that have an economic value of approximately \$11,000.00 per year at no cost to participants. Ms. Rainey enrolled her son prior to the start of the first day of school, but I advised Kelli Cunningham to encourage Ms. Rainey to remove her son from enrollment until an ethics opinion could be rendered, which she did.

Priority for the Head Start Program is given to households that are below 100% of poverty, then to households that are 100-130% of poverty, and lastly to households above 130% of

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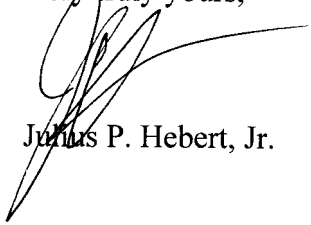
August 10, 2021

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poverty. Ms. Rainey's household income is considered above 130% of poverty. It is my understanding that at the time of her son's enrollment, there were no children that met the first two priorities on the waiting list, however since the time Ms. Rainey's child was enrolled, new applications have been received from families that meet the first two income priorities. With this being said, it is expected that there will be placements available for families above 130% of poverty.

With warmest regards, I remain

Very truly yours,



Julius P. Hebert, Jr.

JPH:dab

cc: Via E-Mail

Gordon E. Dove, Parish President

Mike Toups, Parish Manager

Dana Ortego, Human Resources Director

Kelli Cunningham, Housing and Human Services Director

Araminta Rainey, TPCG employee

CERTIFIED MAIL



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